

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

United States Courts
Southern District of Texas
FILED

APR 10 2019

UNITED STATES OF AMERICA

David J. Bradley, Clerk of Court

v.

ROBERT VELASQUEZ

§
§
§
§

CRIMINAL NUMBER

C - 19 - 311

INDICTMENT

THE GRAND JURY CHARGES THAT:

INTRODUCTION

At all times material to this Indictment:

1. The term "minor" is defined, pursuant to Title 18, United States Code, Section 2256(1), as "any person under the age of eighteen years."
2. The term "sexually explicit conduct" is defined, pursuant to Title 18, United States Code, Section 2256(2), as any:

"actual or simulated -

- (A) sexual intercourse, including genital [to] genital, oral [to] genital, anal [to] genital, or oral [to] anal, whether between persons of the same or opposite sex; [or]
- (B) bestiality; [or]
- (C) masturbation; [or]
- (D) sadistic or masochistic abuse; or
- (E) [the] lascivious exhibition of the genitals or pubic area of any person."

3. The term "computer" is defined, pursuant to Title 18, United States Code, Sections 2256(6) and 1030(e)(1), as any:

"electronic, magnetic, optical, electrochemical, or other high speed data processing device performing logical, arithmetic, or storage functions, and includes any data storage facility or communications facility directly related to or operating in conjunction with such device, but such term does not include an automated typewriter or typesetter, a portable hand held calculator or other similar device."

4. The term "child pornography", for purposes of this Indictment, is defined, pursuant to

Title 18, United States Code, Section 2256(8)(A), and limited to:

"any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where -

(A) the production of such visual depiction involves the use of a minor engaged in sexually explicit conduct."

5. The term "visual depiction" is defined, pursuant to Title 18, United States Code, Section 2256(5), as including, but is not limited to, any:

"undeveloped film and videotape, and data stored on computer disk or by electronic means which is capable of conversion into a visual image."

COUNT ONE

Between on or about August 14, 2018, and on or about November 12, 2018, in the Corpus Christi Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

ROBERT VELASQUEZ,

did knowingly employ, use, persuade, induce, entice, and coerce a minor, to wit: S.P., a female minor, to engage in sexually explicit conduct for the purpose of producing any visual depictions of such conduct, knowing and having reason to know that such visual depictions were produced and transmitted using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means including by computer.

In violation of Title 18, United States Code, Sections 2251(a), 2251(e).

COUNT TWO

On or about October 11, 2018, in the Corpus Christi Division of the Southern District of

Texas and elsewhere within the jurisdiction of the Court, the defendant,

ROBERT VELASQUEZ,

did knowingly employ, use, persuade, induce, entice, and coerce a minor, to wit: S.G., a female minor, to engage in sexually explicit conduct for the purpose of producing any visual depictions of such conduct, knowing and having reason to know that such visual depictions would be transported or transmitted using any means or facility of interstate and foreign commerce by any means including by computer and such visual depictions have been transported and transmitted using any means or facility of interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a), 2251(e).

COUNT THREE

Between on or about June 6, 2018, and on or about September 7, 2018, in the Corpus Christi Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

ROBERT VELASQUEZ,

using a facility and means of interstate and foreign commerce, that is a telephone and a computer connected to the internet, knowingly attempted to persuade, induce, entice and coerce P.C., an individual, who had not attained the age of 18 years to engage in sexual activity for which the defendant can be charged with a criminal offence, that is, Aggravated Sexual Assault, Texas Penal Code § 22.021.

In violation of Title 18, United States Code, Section 2422(b).

COUNT FOUR

Between on or about July 26, 2018, and on or about December 20, 2018 in the Corpus Christi Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

ROBERT VELASQUEZ,

using a facility and means of interstate and foreign commerce, that is a telephone and a computer connected to the internet, knowingly attempted to persuade, induce, entice and coerce S.G., an individual, who had not attained the aged of 18 years to engage in sexual activity for which the defendant can be charged with a criminal offence, that is, Aggravated Sexual Assault, Texas Penal Code § 22.021.

In violation of Title 18, United States Code, Section 2422(b).

COUNT FIVE

Between on or about August 14, 2018, and on or about December 20, 2018, in the Corpus Christi Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

ROBERT VELASQUEZ,

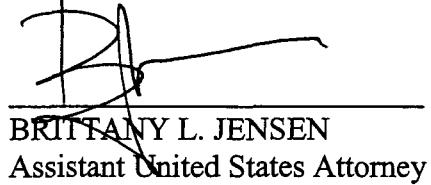
using a facility and means of interstate and foreign commerce, that is a telephone and a computer connected to the internet, knowingly attempted to persuade, induce, entice and coerce S.P., an individual, who had not attained the aged of 18 years to engage in sexual activity for which the defendant can be charged with a criminal offence, that is, Sexual Assault, Texas Penal Code § 22.011.

In violation of Title 18, United States Code, Section 2422(b).

A TRUE BILL:
ORIGINAL SIGNATURE ON FILE
FOREPERSON OF THE GRAND JURY

RYAN K. PATRICK
UNITED STATES ATTORNEY

By:


BRITTANY L. JENSEN
Assistant United States Attorney